

Filed March 20, 2003

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI, OHIO**

COPY

Shirley A. McClure
6308 Corbly St. #15
Cincinnati, OH 45230

Plaintiff

vs.

**Gannett Media Technologies
International (GMTI), et al**
151 W. Fourth Street #201
Cincinnati, OH 45202

Defendants

) Case No. C-1-01-751

)
) Judge Beckwith
) Magistrate Judge Hogan

) **MOTION FOR DEFAULT**
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)

I the Plaintiff, Shirley McClure, make a Motion for Default judgment against defendants Michael A. Roberts, "legal" representative of GMTI, for conspiracy in bad faith in the extreme, including defendants named and not named therein of GMTI, for the willful, flagrant and repeated Criminal violations that have irreversibly prejudiced the Plaintiff's case from the very beginning showing contempt for the Plaintiff Mrs. McClure and Contempt of Court. These flagrant, repeated actions in the extreme of this fairytale defense, with malice aforethought, show cause for the severest of sanctions. A Memorandum of Support is attached.

Respectfully Submitted,

Shirley McClure, Plaintiff
6308 Corbly St. #15
Cincinnati, OH 45230
(513) 232-8234